

AWRENCE A. ORGAN (SBN 175503)  
larry@civilrightsca.com  
MARQUI HOOD (SBN 214718)  
marqui@civilrightsca.com  
CIMONE A. NUNLEY (SBN 326915)  
cimone@civilrightsca.com  
**CALIFORNIA CIVIL RIGHTS LAW GROUP**  
332 San Anselmo Avenue  
San Anselmo, California 94960  
Telephone: (415)-453-7352  
Facsimile: (415)-785-7352

J. BERNARD ALEXANDER (SBN 128307)  
balexander@amflp.com  
**ALEXANDER MORRISON & FEHR LLP**  
1900 Avenue of the Stars, Suite 900  
Los Angeles, California 90067  
Telephone: (310) 394-0888  
Facsimile: (310) 394-0811

Attorneys for Plaintiff,  
OWEN DIAZ

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

OWEN DIAZ,  
Plaintiff,  
v.  
TESLA, INC. dba TESLA MOTORS, INC.;  
Defendant.

MICHAEL RUBIN (SBN 80618)  
mrubin@altber.com  
JONATHAN ROSENTHAL (SBN 329638)  
jrosenthal@altber.com  
**ALTSHULER BERZON LLP**  
177 Post Street, Suite 300  
San Francisco, California 94108  
Telephone: (415) 421-7151  
Facsimile: (415) 362-8064

DUSTIN L. COLLIER (SBN 264766)  
dcollier@collierlawsf.com  
V. JOSHUA SOCKS (SBN 303443)  
jsocks@collierlawsf.com  
ELIZABETH R. MALAY (SBN 336745)  
emalay@collierlawsf.com  
DREW F. TETI (SBN 267641)  
drew@collierlawsf.com  
**COLLIER LAW FIRM, LLP**  
240 Tamal Vista Blvd. Suite 100  
Corte Madera, CA 94925  
Telephone: (415) 767-0047  
Facsimile: (415) 767-0037

Case No. 3:17-cv-06748-WHO

**PLAINTIFF'S PROPOSED CURATIVE  
INSTRUCTION RE DIRECT/STAFFING  
AGENCY EMPLOYEES**

Trial Date: March 27, 2023  
Complaint filed: October 16, 2017

**DIRECT AND STAFFING AGENCY EMPLOYEES**

You have heard evidence that some employees and supervisors at the Tesla factory were hired by Tesla directly and that some were hired by Tesla through staffing agencies. Your determination of the amount of compensatory and punitive damages to which plaintiff Owen Diaz is entitled should not be affected by whether any particular employee or supervisor was hired directly or through a staffing agency.

CALIFORNIA CIVIL RIGHTS LAW GROUP  
ALEXANDER MORRISON + FEHR LLP  
ALTSHULER BERZON LLP  
COLLIER LAW FIRM, LLP

DATED: March 29, 2023



Attorney for Plaintiff  
OWEN DIAZ